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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FERNALD
LOG C-1585

2002 JUL 26 A 9:42

FILE: 4446.1CC17E

REPLY TO THE ATTENTION OF:

JUL 25 2002

Mr. Johnny W. Reising
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

SRF-5J

RE: A9,PI Draft
Certification Report

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) draft certification report for Area 9, Phase I (A9,PI).

The report provides the results of certification sampling in A9,PI, discusses whether further remediation is necessary, and if the area has met final remediation levels.

U.S. EPA has enclosed several comments on the certification report. The report includes a large amount of data that are estimated values (j-qualified) which need further explanation.

Therefore, U.S. EPA disapproves the A9,PI draft certification report. U.S. DOE must submit responses to comments and a revised document incorporating adequate responses to U.S. EPA's comments within (30) thirty days receipt of this letter.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,

James A. Saric
Remedial Project Manager
Federal Facilities Section
SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OEPA-SWDO
Sally Robison, U.S. DOE-HDQ
Jamie Jameson, Fluor Fernald
Terry Hagen, Fluor Fernald
Tim Poff, Fluor Fernald

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bcc w/enclosure:
Mary Wojciechowski, Tetra Tech
Gene Jablonowski, SRF-5J

bcc w/o enclosure:
Brian Barwick, ORC

TECHNICAL REVIEW COMMENTS ON "CERTIFICATION REPORT FOR AREA 9, Phase I"

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

GENERAL COMMENT

Commenting Organization: U.S. EPA Commentor: Saric
Section #: Not Applicable (NA) Page #: NA Line #: NA
General Comment #: 1
Comment: The certification report does not demonstrate that the quality of analytical results presented in the report is known and adequate for certifying that soil in Area 9, Phase I, certification units (CU) does not require remediation. Specifically, Appendix A of the report shows that more than 95 percent of analytical results for the primary constituents of concern (COC) are "estimated or imprecise" values (J-qualified). Use of such data to conclude whether a CU contains a given COC above a final remediation level (FRL) is questionable. For this reason, complete data packages and associated data validation reports for the Area 9, Phase I, investigation should be submitted to the U.S. Environmental Protection Agency (U.S. EPA).

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 3.1 Page #: 3-1 Lines #: 30 and 31
Original Specific Comment #: 1
Comment: The sampling depth intervals mentioned in Line 30 (12 to 36 inches) and Line 31 (6 to 36 inches) are not the same. The accuracy of information presented in Lines 30 and 31 should be verified and revised as necessary.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 3.1 Pages #: 3-3 through 3-5 Line #: NA
Original Specific Comment #: 2
Comment: The text does not present summary statements regarding (1) *a posteriori* test results for CUs 7 and 11 or (2) the statistical comparison of analytical results with the FRLs for CUs 2, 3, 4, 5, 9, 13, 16, 17, 18, 19, and 20. The report should be revised to include the missing information.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 3.2 Page #: 3-6 Lines #: 19 and 20
Original Specific Comment #: 3
Comment: The text does not contain complete information on the analytical method for Aroclor 1260 analysis. The certification report should be revised to include the method number in addition to the method source.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 4.2 Pages #: 4-3 and 4-4 Lines #: NA
Original Specific Comment #: 4
Comment: The text should be revised to include (1) the reference used for the method for verifying and validating organic data; (2) additional parameters examined during the verification and validation of organic data (for example, surrogate recoveries); and (3) additional data qualifiers used, as applicable.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 4.3 Page #: 4-5 Lines #: 25 through 33
Original Specific Comment #: 5
Comment: The text should be revised to include a complete description of the sample identification numbering system. Specifically, the term "RM" should be defined. In addition, the depth indicator field in the sample identification number currently shows that "2" represents both surface and subsurface samples. The text should be corrected to show that "2" represents only subsurface samples. ("1" represents surface samples.)

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 4.3 Page #: 4-6 Lines #: 13 through 23
Original Specific Comment #: 6
Comment: The text states that for radiological parameters, uncertainty associated with each "sample result" is indicated through total propagated uncertainty (TPU); however, the certification report does not discuss TPU. The report should be revised to include available information regarding the uncertainty associated with analytical results.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 5.0 Pages #: 5-1 through 5-10 Lines #: NA
Original Specific Comment #: 7
Comment: The information presented in Section 5.0 of the certification report cannot be properly evaluated because of the data quality issue stated above in the General Comment. The additional information requested in the General Comment should be provided for U.S. EPA review.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: Appendix A.1 Pages #: NA Lines #: NA
Original Specific Comment #: 8
Comment: The appendix should define all abbreviations and symbols used in the tables. In addition, it should specify the statistical significance level for the normality test before determining that the data were not normally distributed and had to be transformed to test for lognormality.

6